

Prop 65 Pre-Launch Checklist

For private label supplements and skincare

Brand:

Date:

The 4-Question Prop 65 Check

- | | |
|-------------------------|------------------------|
| 1. California exposure? | No → No warning needed |
| 2. 10+ employees? | No → No warning needed |
| 3. Listed chemical? | No → No warning needed |
| 4. Above safe harbor? | No → No warning needed |

Four Yes answers → Reformulate, change supplier, or warn

Before your first production run

- ☐ Map where the product will sell: California stores, your own site, marketplaces.
- ☐ Confirm which businesses in your chain have 10 or more employees.
- ☐ Check every ingredient against the Proposition 65 list, which OEHHA's program publishes.
- ☐ Get heavy-metal results (lead, cadmium, arsenic, mercury) on the COA for botanicals, minerals and powders.
- ☐ Calculate daily exposure (ppm × grams per day) and compare it with the safe harbor level.
- ☐ Decide: reformulate, change ingredient supplier, or warn.
- ☐ If you warn: use the right format (food or consumer product), name the chemical, use a signal word and the right web address.
- ☐ Put it in writing: who tests, who words the warning, who notifies retailers, and who renews written notices each year.

$\mu\text{g per day} = \text{ppm} \times \text{grams per daily serving}$

Notes:

Screening aid only, not legal advice. Confirm borderline results with your testing lab or a Prop 65 attorney.